

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

TAMARIS (GIBRALTAR) LIMITED,
Madison Building,
Midtown, Queensway, Gibraltar,

Plaintiff,

v.

AMPPRAGMATICPLAY.COM,
ASIA-PRAGMATICPLAY.COM,
CHEATPRAGMATICPLAY.COM,
CHEATSLOTPRAGMATICPLAYS.COM,
CK20-PRAGMATICPLAY.NET,
DK11-PRAGMATICPLAY.NET,
GS10-PRAGMATICPLAY.COM,
GS10-PRAGMATICPLAY.NET,
HACKPRAGMATICPLAYPRO.COM,
JACKPOTPLAYPRAGMATICPLAY.NET,
JURAGANPRAGMATICPLAY.COM,
LINKPRAGMATICPLAY.NET,
LIVE777SLOTPRAGMATICPLAY.COM,
MAHJONGWINSPRAGMATICPLAY.COM,
PRAGMATIC-PLAY.NET,
PRAGMATIC-PLAY88.COM,
PRAGMATIC-PLAYS.COM,
PRAGMATIC-PLAYS.NET,
PRAGMATICPLAY888.COM,
PRAGMATICPLAY1.COM,
PRAGMATICPLAY100.ORG,
PRAGMATICPLAY168.COM,
PRAGMATICPLAY2024.COM,
PRAGMATICPLAY24.COM,
PRAGMATICPLAY356.COM,
PRAGMATICPLAY4D.COM,
PRAGMATICPLAY98.COM,
PRAGMATICPLAY999.COM,
PRAGMATICPLAY99SLOT.COM,
PRAGMATICPLAYA.COM,
PRAGMATICPLAYCASINO365.COM,
PRAGMATICPLAYFRIENDS.COM,
PRAGMATICPLAYGACORSLOT.COM,
PRAGMATICPLAYJ.COM,

Civil Action No. 1:24-cv-00748

PRAGMATICPLAYLOTTERY.COM,
PRAGMATICPLAYMALAYSIA.COM,
PRAGMATICPLAYMMK.COM,
PRAGMATICPLAYMY.COM,
PRAGMATICPLAYMYANMAR.COM,
PRAGMATICPLAYOYNA.NET,
PRAGMATICPLAYP.COM,
PRAGMATICPLAYPHP.COM,
PRAGMATICPLAYPUSAT.COM,
PRAGMATICPLAYQ.COM,
PRAGMATICPLAYSLOT365.NET,
PRAGMATICPLAYTRIOFUS.COM,
PRAGMATICPLAYTRIOFUS.NET,
PRAGMATICPLAYTRIOFUS.ORG,
PRAGMATICPLAYX500.COM,
PRAGMATICPLAYYYY.COM,
PROGMATICPLAY.NET,
QQPRAGMATICPLAY.COM,
RAJAPRAGMATICPLAY.COM,
RATUPRAGMATICPLAY.COM,
RTPLIVEPRAGMATICPLAY.ORG,
SDK11-PRAGMATICPLAY.NET,
SLOTDEMOPRAGMATICPLAY.COM,
SLOTGACORPRAGMATICPLAY88.COM,
SLOTOLYMPUSPRAGMATICPLAY.COM,
SLOTPRAGMATICPLAYVITTON.COM,
SUGAR-RUSH-PRAGMATIC-PLAY.COM, and
VIPPRAGMATICPLAY.COM, Internet Domain
Names,

Defendants.

COMPLAINT

Plaintiff Tamaris (Gibraltar) Limited, operating as Pragmatic Play (“Plaintiff” or “Pragmatic Play”), through counsel, alleges as follows for its *in rem* Complaint against Defendants

AMPPRAGMATICPLAY.COM,

ASIA-PRAGMATICPLAY.COM,

CHEATPRAGMATICPLAY.COM,

CHEATSLOTPRAGMATICPLAYS.COM, CK20-

PRAGMATICPLAY.NET, DK11-PRAGMATICPLAY.NET, GS10-PRAGMATICPLAY.COM,

GS10-PRAGMATICPLAY.NET,

HACKPRAGMATICPLAYPRO.COM,

JACKPOTPLAYPRAGMATICPLAY.NET, JURAGANPRAGMATICPLAY.COM,
LINKPRAGMATICPLAY.NET, LIVE777SLOTPRAGMATICPLAY.COM,
MAHJONGWINSPRAGMATICPLAY.COM, PRAGMATIC-PLAY.NET, PRAGMATIC-
PLAY88.COM, PRAGMATIC-PLAYS.COM, PRAGMATIC-PLAYS.NET,
PRAGMATICHOTPLAY888.COM, PRAGMATICPLAY1.COM,
PRAGMATICPLAY100.ORG, PRAGMATICPLAY168.COM,
PRAGMATICPLAY2024.COM, PRAGMATICPLAY24.COM, PRAGMATICPLAY356.COM,
PRAGMATICPLAY4D.COM, PRAGMATICPLAY98.COM, PRAGMATICPLAY999.COM,
PRAGMATICPLAY99SLOT.COM, PRAGMATICPLAYA.COM,
PRAGMATICPLAYCASINO365.COM, PRAGMATICPLAYFRIENDS.COM,
PRAGMATICPLAYGACORSLOT.COM, PRAGMATICPLAYJ.COM,
PRAGMATICPLAYLOTTERY.COM, PRAGMATICPLAYMALAYSIA.COM,
PRAGMATICPLAYMMK.COM, PRAGMATICPLAYMY.COM,
PRAGMATICPLAYMYANMAR.COM, PRAGMATICPLAYOYNA.NET,
PRAGMATICPLAYP.COM, PRAGMATICPLAYPHP.COM,
PRAGMATICPLAYPUSAT.COM, PRAGMATICPLAYQ.COM,
PRAGMATICPLAYSLOT365.NET, PRAGMATICPLAYTRIOFUS.COM,
PRAGMATICPLAYTRIOFUS.NET, PRAGMATICPLAYTRIOFUS.ORG,
PRAGMATICPLAYX500.COM, PRAGMATICPLAYYYY.COM, PROGMATICPLAY.NET,
QQPRAGMATICPLAY.COM, RAJAPRAGMATICPLAY.COM,
RATUPRAGMATICPLAY.COM, RTPLIVEPRAGMATICPLAY.ORG,
SDK11-PRAGMATICPLAY.NET, SLOTDEMOPRAGMATICPLAY.COM,
SLOTGACORPRAGMATICPLAY88.COM, SLOTOLYMPUSPRAGMATICPLAY.COM,

SLOTPRAGMATICPLAYVITTON.COM, SUGAR-RUSH-PRAGMATIC-PLAY.COM, and VIPPRAGMATICPLAY.COM (the “Defendant Domain Names”).

NATURE OF THE SUIT

1. This is an *in rem* action for cybersquatting under the Federal Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d).

2. Recent studies have shown that over 95% of the 500 most popular sites on the Internet are the subject of “typosquatting”—registration or use of a domain name that represents a typographical error of the legitimate site—and which is typically used to display advertisements related to the legitimate site, to distribute computer viruses or “malware,” to collect visitors’ personal information for inappropriate or illegal uses, or to send “business impersonation” emails.

3. Typosquatting harms consumers by causing confusion with the legitimate sites being sought by the consumers and very often results in consumers’ computers being infected with computer viruses, “bloatware” or other unwanted software, consumer’s personal information being collected and misused, and/or consumers being presented with an endless stream of unwanted advertisements.

4. In the present case, PragmaticPlay’s invaluable rights in its distinctive trademark (the “PRAGMATIC PLAY mark”) have been deliberately infringed through the bad faith registration, use, and/or trafficking of the Defendant Domain Names, which domain names are confusingly similar to the PRAGMATICPLAY mark.

PARTIES

5. Tamaris (Gibraltar) Limited is a Gibraltarian limited company with a principal business address of Madison Building, Midtown, Queensway, Gibraltar.

6. AMPPRAGMATICPLAY.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 1.

7. ASIA-PRAGMATICPLAY.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 2. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the geographically descriptive term "Asia."

8. CHEATPRAGMATICPLAY.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 3. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the descriptive term "cheat," which relates to Pragmatic Play's gaming services. Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

9. CHEATSLOTPRAGMATICPLAYS.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 4. The domain wholly

incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the descriptive terms "cheat" and "slot," which relate to Pragmatic Play's gaming services.

10. CK20-PRAGMATICPLAY.NET is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using a privacy service to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 5. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the abbreviation for the geographically descriptive term "Cook Islands" and nondistinctive numbering. Upon information and belief the domain is configured as an API domain used for online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

11. DK11-PRAGMATICPLAY.NET is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 6. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the abbreviation for the geographically descriptive term "Denmark" and nondistinctive numbering. Upon information and belief the domain is configured as an API domain used for online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

12. GS10-PRAGMATICPLAY.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 7. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the abbreviation for the geographically

descriptive term “South Georgia and the South Sandwich Islands” and nondistinctive numbering. Upon information and belief the domain is configured as an API domain used for online gaming services that are identical and/or similar and/or related to Pragmatic Play’s gaming services.

13. GS10-PRAGMATICPLAY.NET is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 8. The domain wholly incorporates Pragmatic Play’s protected PRAGMATIC PLAY mark with the abbreviation for the geographically descriptive term “South Georgia and the South Sandwich Islands” and nondistinctive numbering. Upon information and belief the domain is configured as an API domain used for online gaming services that are identical and/or similar and/or related to Pragmatic Play’s gaming services.

14. HACKPRAGMATICPLAYPRO.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 9. The domain wholly incorporates Pragmatic Play’s protected PRAGMATIC PLAY mark with the descriptive terms “hack” and “pro,” which relate to Pragmatic Play’s gaming services. Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play’s gaming services.

15. SLOTPRAGMATICPLAYVITTON.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 10. The domain wholly

incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the descriptive terms "slot" and "vitton." Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

16. JACKPOTPLAYPRAGMATICPLAY.NET is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service PrivacyGuardian.org LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 11. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the descriptive terms "jackpot" and "play," which relate to Pragmatic Play's gaming services.

17. JURAGANPRAGMATICPLAY.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 12. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the descriptive term "juragan," which is Indonesian slang for "boss," and which relates to Pragmatic Play's gaming services. Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

18. LINKPRAGMATICPLAY.NET is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 13. The domain wholly incorporates Pragmatic

Play's protected PRAGMATIC PLAY mark with the descriptive term "link," which relates to Pragmatic Play's gaming services. Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

19. LIVE777SLOTPRAGMATICPLAY.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 14. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the descriptive terms "live," and "slot" which relate to Pragmatic Play's gaming services, and non-distinctive numbering. The domain currently resolves to a webpage displaying pay-per-click advertising.

20. MAHJONGWINSPRAGMATICPLAY.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 15. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the descriptive terms "mahjong" and "wins," which relate to Pragmatic Play's gaming services. Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

21. PRAGMATIC-PLAY.NET is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 16. Upon information and belief, the domain has

been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

22. PRAGMATIC-PLAY88.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 17.

23. PRAGMATIC-PLAYS.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 18. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of a hyphen.

24. PRAGMATIC-PLAYS.NET is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 19. The domain wholly incorporates a common typo of Pragmatic Play's protected PRAGMATIC PLAY mark. The domain currently resolves to a webpage displaying pay-per-click advertising.

25. SUGAR-RUSH-PRAGMATIC-PLAY.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Privacy Guardian, LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 20. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the phrase "sugar rush," which is a direct reference to one of Pragmatic Play's games. Upon information and belief,

the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

26. PRAGMATICHOTPLAY888.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 21. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of nondistinctive numbering and the descriptive term "hot," which relates to Pragmatic Play's gaming services. Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

27. VIPPRAGMATICPLAY.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 22. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the descriptive term "vip," which relates to Pragmatic Play's gaming services. Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

28. PRAGMATICPLAY1.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 23. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of nondistinctive numbering. Upon

information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

29. PRAGMATICPLAY100.ORG is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 24. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of nondistinctive numbering. Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

30. PRAGMATICPLAY168.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 25. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of nondistinctive numbering. Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

31. PRAGMATICPLAY2024.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 26. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of nondistinctive numbering.

32. PRAGMATICPLAY24.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service

Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 27. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of nondistinctive numbering. Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

33. PRAGMATICPLAY356.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 28. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of nondistinctive numbering.

34. PRAGMATICPLAY4D.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 29. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of nondistinctive numbers and letters. Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

35. PRAGMATICPLAY98.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 30. The domain wholly incorporates Pragmatic

Play's protected PRAGMATIC PLAY mark with the addition of nondistinctive numbering. The domain currently resolves to a webpage displaying pay-per-click advertising.

36. PRAGMATICPLAY999.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 31. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of nondistinctive numbering. Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

37. PRAGMATICPLAY99SLOT.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 32. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of nondistinctive numbering and the descriptive term "slot," which relates to Pragmatic Play's gaming services. The domain currently resolves to a webpage displaying pay-per-click advertising.

38. PRAGMATICPLAYA.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 33. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of nondistinctive lettering.

39. PRAGMATICPLAYCASINO365.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the

privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 34. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of nondistinctive numbering and the descriptive term "casino," which relates to Pragmatic Play's gaming services. The domain currently resolves to a webpage displaying pay-per-click advertising.

40. PRAGMATICPLAYFRIENDS.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 35. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the descriptive term "friends." The domain currently resolves to a webpage displaying pay-per-click advertising.

41. PRAGMATICPLAYGACORSLOT.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 36. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the Indonesian term "gacor" and the term "slot," which relate to Pragmatic Play's gaming services. The domain currently resolves to a webpage displaying pay-per-click advertising.

42. PRAGMATICPLAYJ.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name

registration record is attached hereto as Exhibit 37. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of nondistinctive lettering. The domain currently resolves to a webpage displaying pay-per-click advertising.

43. PRAGMATICPLAYLOTTERY.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 38. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the descriptive term "lottery," which relates to Pragmatic Play's gaming services. The domain currently resolves to a webpage displaying pay-per-click advertising.

44. PRAGMATICPLAYMALAYSIA.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 39. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the geographically descriptive term "Malaysia." The domain currently resolves to a webpage displaying pay-per-click advertising.

45. PRAGMATICPLAYMMK.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 40. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the abbreviation for the Myanmar Kyat, the national currency of Myanmar. Upon information and belief, the domain has been used

to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

46. PRAGMATICPLAYMY.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 41. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the geographically descriptive abbreviation for "Malaysia." The domain currently resolves to a webpage displaying pay-per-click advertising.

47. PRAGMATICPLAYMYANMAR.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 42. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the geographically descriptive term "Myanmar." Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

48. PRAGMATICPLAYOYNA.NET is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Privacy Guardian LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 43. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the descriptive term "oyna," which means "play" in Turkish and relates to Pragmatic Play's gaming services. Upon information

and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

49. PRAGMATICPLAYP.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 44. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of nondistinctive lettering. The domain currently resolves to a webpage displaying pay-per-click advertising.

50. PRAGMATICPLAYPHP.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 45. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the abbreviation for the geographically descriptive term "Philippines." Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

51. PRAGMATICPLAYPUSAT.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 46. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the Filipino term "pusat," which means "center" and relates to Pragmatic Play's gaming services.

52. PRAGMATICPLAYQ.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 47. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of nondistinctive lettering. Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

53. PRAGMATICPLAYSLOT365.NET is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 48. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of nondistinctive numbering and the descriptive term "slot," which relates to Pragmatic Play's gaming services. Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

54. PRAGMATICPLAYTRIOFUS.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 49. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the Indonesian term "triofus," which relates to Pragmatic Play's gaming services.

55. PRAGMATICPLAYTRIOFUS.NET is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy

service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 50. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the Indonesian term "triofus," which relates to Pragmatic Play's gaming services.

56. PRAGMATICPLAYTRIOFUS.ORG is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 51. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the Indonesian term "triofus," which relates to Pragmatic Play's gaming services. Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

57. PRAGMATICPLAYX500.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 52. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of non-distinctive numbering and lettering. Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

58. PRAGMATICPLAYYY.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name

registration record is attached hereto as Exhibit 53. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of non-distinctive lettering.

59. PROGMATICPLAY.NET is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 54. The domain wholly incorporates a common typo of Pragmatic Play's protected mark. The domain currently resolves to a webpage displaying pay-per-click advertising.

60. QQPRAGMATICPLAY.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 55. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of non-distinctive lettering. Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

61. RAJAPRAGMATICPLAY.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 56. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the Sanskrit term for "king," which relates to Pragmatic Play's gaming services.

62. RATUPRAGMATICPLAY.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service

Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 57. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the Indonesian term for "queen," which relates to Pragmatic Play's gaming services.

63. RTPLIVEPRAGMATICPLAY.ORG is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 58. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the descriptive term "live" and the abbreviation for the phrase "return to player," which relates to Pragmatic Play's gaming services. The domain currently resolves to a webpage displaying pay-per-click advertising.

64. SDK11-PRAGMATICPLAY.NET is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 59. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the abbreviation for the term "software development kit," which relates to Pragmatic Play's gaming services. Upon information and belief the domain is configured as an API domain used for online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

65. SLOTDEMOPRAGMATICPLAY.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ECF to conceal his/her/its identity and location. A copy of

the domain name registration record is attached hereto as Exhibit 60. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the descriptive terms "slot" and "demo," which relate to Pragmatic Play's gaming services. Upon information and belief, the domain has been used to offer and/or promote online gaming services that are identical and/or similar and/or related to Pragmatic Play's gaming services.

66. SLOTGACORPRAGMATICPLAY88.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 61. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the descriptive term "slot" and the descriptive Indonesia term "gacor," which relate to Pragmatic Play's gaming services. The domain currently resolves to a webpage displaying pay-per-click advertising.

67. SLOTOLYMPUSPRAGMATICPLAY.COM is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record is attached hereto as Exhibit 62. The domain wholly incorporates Pragmatic Play's protected PRAGMATIC PLAY mark with the addition of the descriptive terms "slot" and "olympus," which relate to Pragmatic Play's gaming services. The domain currently resolves to a webpage displaying pay-per-click advertising.

JURISDICTION, VENUE, AND JOINDER

68. This is a civil action for federal cybersquatting in violation of the Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d).

69. This Court has original jurisdiction under 15 U.S.C. § 1121(a) and 28 U.S.C. §§ 1331 and 1338(a).

70. This Court has *in rem* jurisdiction over the Defendant Domain Names pursuant to 15 U.S.C. § 1125(d)(2)(A). *In rem* jurisdiction is appropriate under 15 U.S.C. § 1125(d)(2)(A)(ii) because there is either no registrant field in the WhoIs record for the Defendant Domain Names, or where there is a registrant field, that field reflects a privacy service or, a fictitious person/entity, and/or an individual residing outside the United States, and therefore Pragmatic Play cannot obtain *in personam* jurisdiction over a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A) and/or Pragmatic Play, despite its due diligence, has been unable to find a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

71. Pursuant to 15 U.S.C. § 1125(d)(2)(A)(ii)(II)(aa), Pragmatic Play will give notice of the violations of its rights, and its intent to proceed *in rem*, to the contact addresses set forth in the registration records for each of the Defendant Domain Names.

72. Venue is proper in this District pursuant to 15 U.S.C. § 1125(d)(2)(C) in that the registry operator for the .COM, .ORG, and .NET domain registries, VeriSign, Inc., is situated in this judicial district, and the Defendant Domain Names are all .COM, .ORG, or .NET domain names.

73. Joinder of the Defendant Domain Names is proper under Fed. R. Civ. P. 20(a)(2) in that the *in rem* cybersquatting claim set forth herein appears to arise out of the same series of transactions, groups of the Defendant Domain Names share registrars, hosts, and/or other common features indicative of common ownership or use, and the same questions of law are common to all of the Defendant Domain Names. For instance, the registration records demonstrate that all of the Defendant Domain Names cybersquat the same PRAGMATIC PLAY mark and do so in similar

ways—by adding descriptive terms or nondescriptive characters to Pragmatic Play’s protected mark. Almost all the Defendant Domain Names were registered within the last year, share similar nameservers, and use the same privacy services to conceal the registrant of the domain names. Moreover, the claims against all of the Defendant Domain Names will involve the same questions of both fact and law, including whether the registrants of the Defendant Domain Names have engaged in cybersquatting through the bad faith registration, use, or trafficking-in of the Defendant Domain Names.

TAMARIS’S RIGHTS

74. Tamaris (Gibraltar) Limited, operating as Pragmatic Play, is the proprietor of Pragmatic Play’s intellectual property which encompasses trademarks and other assets. Pragmatic Play is a leading developer and provider of mobile and desktop casino games for the online gaming industry.

75. Since 2016, Pragmatic Play has been actively and continuously developing, offering, and supplying a wide range of games under the PRAGMATIC PLAY mark to operators in various jurisdictions.

76. The PRAGMATIC PLAY mark is often used as a word mark and displayed as plain text. At times, the PRAGMATIC PLAY mark is displayed in a stylized form with a design, as shown below:



Pragmatic Play has consistently used this composite mark in association with its gaming services for several years (collectively with the PRAGMATIC PLAY word mark, the “PRAGMATIC PLAY Marks”).

77. Since receiving its first license in 2016, Pragmatic Play has acquired licenses in numerous regulated markets.

78. Pragmatic Play offers an array of games under the PRAGMATIC PLAY Marks, including online slot games, live casino games, bingo, and virtual sports. These services are all available to U.S. citizens abroad, and a subset of these services are made available by social casino operators in select states in the U.S in accordance with applicable state and federal laws.

79. Pragmatic Play has actively participated in marketing activities such as year-round public relations campaigns that ensure brand momentum, paid and earned content marketing including webinars, feature stories and interviews, paid advertising including display banners and newsletter sponsorship, sponsored and attended both physical and virtual events including EGR Awards, Sigma and SBC, social media including LinkedIn, Twitter, Facebook, and Instagram, and constant recognition as a leading supplier across tier-I industry awards. All of these efforts prominently feature the PRAGMATIC PLAY Marks.

80. On October 29, 2014, Pragmatic Play registered the domain name PragmaticPlay.com. Pragmatic Play began publishing gaming content through use of the PRAGMATIC PLAY Marks on its websites in 2015. These websites are internationally accessible.

81. Consumers have come to distinguish and recognize the legitimacy of Pragmatic Play's services as a result of the use and widespread promotion of the PRAGMATIC PLAY Marks.

82. Likely due to the financial elements of online gaming, Pragmatic Play is constantly combatting malicious third parties' attempts to misuse the PRAGMATIC PLAY Marks to confuse, mislead, and/or deceive consumers. To protect both its consumers and its valuable marks, Pragmatic Play has engaged in significant enforcement efforts relating to its intellectual property.

Its efforts include defensive domain name registrations, administrative proceedings under the Uniform Domain Name Dispute Resolution Policy, take-down notices, and anti-cybersquatting actions, including litigation in this Court. *See Tamaris (Gibraltar) Ltd. v. Pragmaticplays.co*, No. 2:24-cv-9 (D. Az. Jan. 3, 2024); *Tamaris (Gibraltar) Ltd. v. Ppgamesusa.com*, 1:23-cv-1692 (E.D. Va. Dec. 23, 2023); *Pragmatic Play Int'l Ltd. v. Agenpragmaticplay.live*, No. 2:23-cv-497 (D. Ariz. Mar. 23, 2023); *Pragmatic Play International Ltd. v. Agen-pragmaticplay.org*, No. 1:23-cv-174 (E.D. Va. Feb. 7, 2023); *Pragmatic Play Int'l Ltd. v. 51ppgame.com*, No. 1:22-cv-1016 (E.D. Va. Sept. 8, 2022); *Pragmatic Play Int'l Ltd. v. 789pragmaticplay.com*, No. 1:22-cv-835 (E.D. Va. July 22, 2022).

83. Based on Pragmatic Play's extensive use and promotion of the PRAGMATIC PLAY Marks, and the recognition and goodwill the marks have achieved in the eyes of the consuming public, the PRAGMATIC PLAY Marks are distinctive and/or famous, and are entitled to broad common law trademark rights.

84. The Defendant Domain Names represent unauthorized colorable imitations of the PRAGMATIC PLAY Marks, which further demonstrates that the PRAGMATIC PLAY Marks have acquired distinctiveness and were famous and/or distinctive prior to the time of registration of the Defendant Domain Names. The PRAGMATIC PLAY Marks have no significance outside being a source identifier for Pragmatic Play's products and services. By choosing to register domains incorporating the PRAGMATIC PLAY Marks, the registrant(s) of the Defendant Domain Names have recognized that source-indicating significance and are seeking to leverage it for their own gain.

85. In addition to its common law trademark rights, Plaintiff possesses statutory rights in the PRAGMATIC PLAY Marks by virtue of its ownership of U.S. trademark registrations for

both the PRAGMATIC PLAY word mark and composite mark, directed to “[e]ntertainment services, namely, providing games of chance via the Internet,” U.S. Reg. Nos. 6848492, 6890979, 7307616, and 7330411. Copies of these registrations are attached as Exhibit 63. Tamaris has also registered numerous other federal trademarks related to its online games, which are covered by U.S. Federal Trademark Registration Nos. 7256467 (RISE OF GIZA POWERNUUDGE), 7184110 (GEMS BONANZA), 7256466 (GATES OF OLYMPUS), 7184109 (GEMS BONANZA), 7184111 (JOKER’S JEWELS), 7202940 (PANDA’S FORTUNE), 7256465 (GATES OF OLYMPUS), 7184107 (JOHN HUNTER AND THE TOMB OF THE SCARAB QUEEN), 7184108 (AZTEC GEMS), 7202941 (PANDA’S FORTUNE), 7202939 (AZTEC GEMS), and 7184112 (JOKER’S JEWELS).

UNLAWFUL REGISTRATION AND/OR USE OF THE DOMAIN NAMES

86. The Defendant Domain Names all reflect wholesale incorporations and/or typographical errors of the PRAGMATIC PLAY Marks, often combined with terms that are descriptive of Pragmatic Play’s services such as “slot,” “olympus,” “hack,” or “jackpot,” or terms that are geographically descriptive of markets where Pragmatic Play offers its services.

87. By typosquatting, the Defendant Domain Names appear to have been registered for the purpose of, *inter alia*, obtaining Internet visitors when such visitors were attempting to reach Pragmatic Play’s services.

88. The Defendant Domain Names have been configured to display pay-per-click advertisements, for email services that could be used to impersonate Pragmatic Play, for API domain names to connect to unauthorized Pragmatic Play games, or to resolve to websites that display unauthorized copies and/or simulations of Pragmatic Play’s intellectual property to mislead viewers into believing the site is affiliated with Pragmatic Play.

89. For those Defendant Domain Names engaged in pay-per-click advertising, upon information and belief, the registrant(s) of the Defendant Domain Names receive compensation when Internet visitors, who were attempting to reach Pragmatic Play's services, click on a link provided by a Defendant Domain Name to a third-party website and/or when the Internet visitors are automatically redirected by a Defendant Domain Name to a third-party website for a sales solicitation.

90. For those Defendant Domain Names configured for email service, upon information and belief, the registrant(s) of the Defendant Domain Names have configured the Defendant Domain Names to be used to send email for the purpose of unlawful impersonation of Pragmatic Play.

91. For those Defendant Domain Names believed to be API domain names, upon information and belief, the registrant(s) of the Defendant Domain Names have configured the Defendant Domain Names to be used to operate unauthorized Pragmatic Play games.

92. For those Defendant Domain Names engaged in misrepresentation as affiliates of Pragmatic Play, upon information and belief, the registrant(s) of the Defendant Domain Names receive compensation when Internet visitors are directed to third-party gaming services, including monies collected from the deceived visitors. Upon information and belief, the misrepresentation is intended in some instances to divert consumers away from legitimate Pragmatic Play offerings to other gaming services including pirated Pragmatic Play software or imitations thereof; and intended in other instances to not offer gaming at all, but rather defraud consumers who are misled into believing that they are providing funds to engage in online gaming.

93. The aforementioned use of the PRAGMATIC PLAY Marks within the Defendant Domain Names and/or associated websites is without authorization from Pragmatic Play.

94. Upon information and belief, the Defendant Domain Names do not and cannot reflect the legal name of the registrant(s) of the Defendant Domain Names.

95. Upon information and belief, the registrant(s) of the Defendant Domain Names have not engaged in bona fide commercial use of the PRAGMATIC PLAY Marks in a website accessible under the Defendant Domain Names and are instead attempting to misrepresent themselves as Pragmatic Play or affiliates thereof.

96. The websites displayed by the registrant(s) of the Defendant Domain Names are likely to be confused with Pragmatic Play's legitimate online locations.

97. Upon information and belief, the registrant(s) of the Defendant Domain Names registered the Defendant Domain Names with intent to divert consumers away from Pragmatic Play's online locations, for commercial gain, by creating a likelihood of confusion as to the source, sponsorship, affiliation, or endorsement of the Defendant Domain Names and the sites displayed through use of the Defendant Domain Names.

98. Upon information and belief, the registrant(s) of the Defendant Domain Names provided material and misleading false contact information when applying for and maintaining the registration of the Defendant Domain Names in that the person or entity identified as the registrant of the Defendant Domain Names is not the true owner of the Defendant Domain Names.

99. The registrant(s) of certain of the Defendant Domain Names use services that replace a domain name owner's contact information with names such as "REDACTED FOR PRIVACY," or the WhoIs records contain no registrant name field, and thereby conceal the identity of the true owner(s) of the domain name.

100. Upon information and belief, if the Defendant Domain Names were registered by different people or entities, the registrants of the Defendant Domain Names acted in concert given

that groups of Defendant Domain Names were registered on the same date, have been registered with the same registrar, are using the same name servers and/or privacy services, and/or resolve to reflect similar unlawful content. *See* Exs. 1–62.

COUNT ONE:
(Violation of the Federal Anti-Cybersquatting Consumer Protection Act)

101. Plaintiff repeats and realleges each and every allegation set forth in the foregoing paragraphs, as though fully set forth herein.

102. Plaintiff's PRAGMATIC PLAY Marks are famous and/or distinctive and were famous and/or distinctive prior to the time of registration of the Defendant Domain Names.

103. The aforesaid acts by the registrant(s) of the Defendant Domain Names constitute registration, maintenance, trafficking in, and/or use of domain names that are identical and/or confusingly similar to Plaintiff's PRAGMATIC PLAY Marks, with bad faith intent to profit therefrom.

104. In light of the concealment of the identities of the true owners of the Defendant Domain Names and/or the registrant's location outside the United States, Plaintiff is not able to obtain *in personam* jurisdiction over the registrant(s) of the Defendant Domain Names or any other person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A) or, alternatively, Plaintiff, despite its due diligence, has been unable to find a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

105. The aforesaid acts by the registrant(s) of the Defendant Domain Names constitute unlawful cyberpiracy in violation of the Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d)(1).

106. The aforesaid acts have caused, and are causing, great and irreparable harm to Plaintiff and the public. The harm to the public includes the potential for fraud stemming from

these domains that are intended to mislead consumers into assuming an association with Pragmatic Play. The harm to Plaintiff includes harm to the value and goodwill associated with the PRAGMATIC PLAY Marks that money cannot compensate. Unless permanently restrained and enjoined by this Court, said irreparable harm will continue.

107. Pursuant to 15 U.S.C. § 1125(d)(2)(D)(i), Plaintiff is entitled to an order directing the registries for the Defendant Domain Names to change the current registrars to Plaintiff's registrar of choice and directing the registrant(s) to be changed to Plaintiff.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests of this Court:

1. That judgment be entered in favor of Plaintiff on its claim of cybersquatting.
2. That the Court order the Defendant Domain Names be transferred to Plaintiff through VeriSign's change of the current domain name registrar(s) to Plaintiff's registrar of choice, Safenames Ltd., and by Safenames Ltd.'s change of the registrant(s) to Plaintiff.
3. That the registrar of any other domain names registered by the registrant(s) of the Defendant Domain Names that resemble or include the PRAGMATIC PLAY Marks be replaced with Plaintiff's registrar of choice and that such registrar change the registrant(s) to Plaintiff.
4. That the Court order an award of costs and reasonable attorney's fees incurred by Plaintiff in connection with this action pursuant to 15 U.S.C. § 1117(a); and
5. That the Court order an award to Plaintiff of such other and further relief as the Court may deem just and proper.

Dated: May 3, 2024

By: /s/ Attison L. Barnes, III
Attison L. Barnes, III (VA Bar No. 30458)
David E. Weslow (for *pro hac admission*)
Spencer C. Brooks (VA Bar No. 94676)
WILEY REIN LLP
2050 M Street NW
Washington, DC 20036
Tel: (202) 719-7000
abarnes@wiley.law
dweslow@wiley.law
scbrooks@wiley.law

*Counsel for Plaintiff
Tamaris (Gibraltar) Limited*